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Attorneys for Defendants
YING VANG and MAYTIA VANG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOSE ESCOBEDO,

Plaintiff,

vs.

CHENG VANG dba SUSHIYAKI; TOU
PAO YANG dba SUSHIYAKI; YING
VANG; MAYTIA VANG,

Defendants.

Case No. 1:23-cv-00207-JLT-BAM

**STIPULATION AND PROPOSED ORDER
CONTINUING INITIAL SCHEDULING
CONFERENCE AND JOINT SCHEDULING
REPORT DUE DATE**

Trial Date: None Set

IT IS HEREBY STIPULATED by and between Plaintiff JOSE ESCOBEDO (“Plaintiff”) and Defendants YING VANG and MAYTIA VANG (collectively “Defendants”) (Plaintiff and Defendants are referred to collectively herein as the “Parties”), by and through their attorneys of record, as follows:

The Court may enter an Order continuing the May 16, 2023 Joint Scheduling Report due date and the May 23, 2022 Initial Scheduling Conference in this matter, by approximately 60 days or as soon

thereafter as pleases the Court. An approximately 60-day continuance will result in the Joint Scheduling Report being due July 18, 2023 and an 8:30 a.m. July 25, 2023 Initial Scheduling Conference.

This is the first continuance of the foregoing matters requested by the Parties.

The Parties believe that good cause exists to enter into this Stipulation and for the Court to issue an Order continuing the aforementioned deadlines.

Good cause exists for these continuances as the deadline for Defendant Maytia Vang to respond to the Complaint is not until June 7, 2023, and the deadline for Defendant Ying Vang to respond to the Complaint is not until July 3, 2023. The other two named defendants in this case are in default. In addition, the Parties agree that good cause exists to continue the Initial Scheduling Conference in this case and the due date for the Parties' Joint Report as such continuances will serve the purpose of reducing the Parties' fees and costs, as well as the Court's resources, as counsel are exploring settlement in this action and believe that the additional time to investigate this matter and engage in further settlement discussions, while minimizing attorney time expended on this case, that will be afforded by the requested continuances will facilitate, and increase the chances of, early settlement of this matter.

DATED: 5/10/2023

MOORE LAW FIRM, P.C.

By: /s/ Tanya E. Moore
Tanya E. Moore, Esq.
Attorneys for Plaintiff
JOSE ESCOBEDO

DATED: 5/10/2023

THE KARLIN LAW FIRM LLP

By: /s/ Rex T. Reeves
Rex T. Reeves, Esq.
Attorneys for Defendants
YING VANG and MAYTIA VANG

SIGNATURE ATTESTATION

I, Rex T. Reeves, attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing using their /s/ electronic signature, as authorized on the date next to their /s/ signature.

DATED: 5/10/2023

By: /s/ Rex T. Reeves
Rex T. Reeves, Esq.

ORDER

Having reviewed the Parties' stipulation above and considered the same, and finding good cause to grant the Parties' request, (1) the Initial Scheduling Conference is CONTINUED to **July 25, 2023, at 9:30 a.m. in Courtroom 8 (BAM) before Magistrate Judge Barbara A. McAuliffe**; and (2) the parties shall meet and confer in advance of the conference and file a joint scheduling report on or before **July 18, 2023**.

IT IS SO ORDERED.

Dated: May 10, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE